IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA).	
V.))	Criminal No. 15-141
YOANDY PEREZ LLANES)	

RECEIPT FOR LOCAL CRIMINAL RULE 16 MATERIAL

The following materials are provided to you pursuant to Local Criminal Rule 16 of the Local Rules of Court for the United States District Court of Western Pennsylvania:

1. Relevant written or recorded statements or confessions of the defendant. Specify:

See transcript of phone call of Yoandy Perez Llanes dated July 9, 2014, contained on CD.

2. Grand Jury testimony of the defendant. Specify:

None.

3. Defendant's prior criminal record attached.

☑ Yes □ No

4. At a time convenient to all parties, the attorney for the defendant will be permitted to inspect and copy all tangible objects, books, papers, documents, buildings or places which are in the possession, custody or control of the government and (a) are material to preparation of defendant's defense, (b) are intended for use by the government as evidence in chief at trial, or (c) were obtained from or belong to the defendant.

Attached hereto is a DVD containing preliminary R.16 materials, and accompanying reference list.

Additionally, the government is in possession of voluminous records, both electronic and paper, including financial records, IRS records and tax returns, grand jury subpoena responses, search warrants and electronic service provider records consistent with R.16 materials. These records are available for review, inspection and copying by contacting the undersigned AUSA to schedule a mutually convenient discovery meeting.

5. Reports of relevant physical or mental examinations and scientific tests. Specify:

The government is not in possession of any physical or mental examination reports. If scientific tests are performed on any materials, the results will be provided in accordance with R. 16.

6. As set forth in applicable case authority, counsel for the government recognizes his/her obligation to seek all evidence favorable to the defendant which is known to the others acting on the government's behalf in this case, and will timely disclose known, material, favorable evidence in a manner which accords due process to the defendant. The following exculpatory material is being disclosed at this time:

The United States is presently unaware of any **Brady** exculpatory material.

Respectfully submitted,

DAVID J. HICKTON United States Attorney

GREGORY C. MELUCCI

Assistant U.S. Attorney

Date

Receipt acknowledged by:

Counsel for Defendant

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Original to Magistrate Copy for Defendant and USA